



RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

RIPDES 2019 Multi-Sector General Permit (MSGP)

February 2020

Margarita Chatterton

## SETTLEMENT AGREEMENT

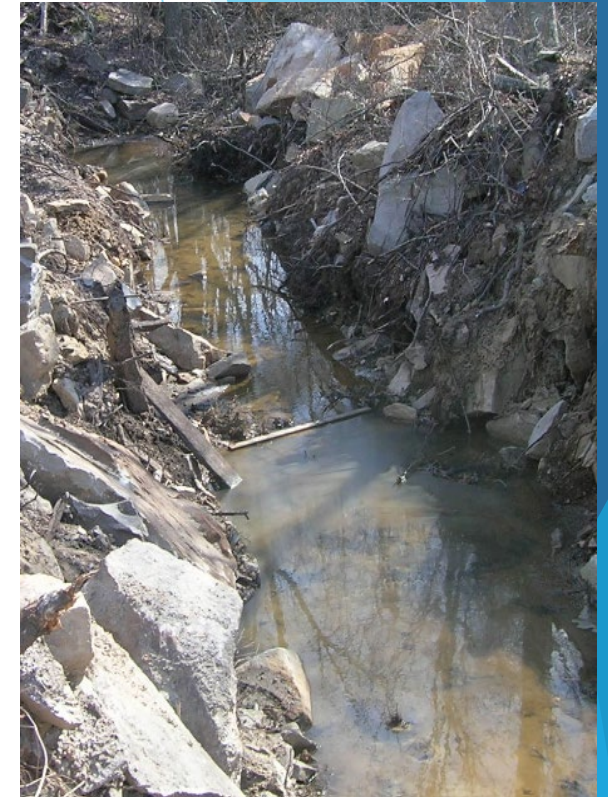
- ▶ ~~EPA-Funded NRC Study: industries not subject to monitoring, additional industrial activity-related pollutants, benchmarks thresholds, frequency of monitoring, monitoring new methodologies or technologies; evaluate feasibility of numeric retention standards.~~
- ▶ WQBELs, effluent limitations that reflect BAT or BCT
- ▶ Tiered Responses to Benchmark Exceedances
- ▶ ~~Preventing Recontamination of Superfund Sites~~
- ▶ ~~No Coal Tar Sealants~~

09/20/2019



# 2019 Multi-Sector General Permit (MSGP)

- ▶ **2019 MSGP INCLUDES CHANGES TO:**
  - ▶ *Monitoring Parameters and Frequency*
    - ▶ *Benchmarks*
    - ▶ *Impaired Waters*
  - ▶ *WQBELs Enhanced BMPs*
  - ▶ *Progressive Increase for Corrective Actions*
  - ▶ *Reporting: Electronic Submission*



# 2019 MSGP Monitoring

- ▶ *Benchmarks (BM) Monitoring*
  - ▶ *Monitoring of TSS, and oil and grease applicable to all permittees*
  - ▶ *Sector Q BMs = Sector R BMs; Sector N with shredding activities added PCBs and Oil & Grease*
  - ▶ *Frequency: increased to 4 times per year (2X Jan-Jun, 2X Jul-Dec, one month minimum between sampling events)*
- ▶ *Impaired Waters Monitoring Regardless of TMDL completed*
  - ▶ *Frequency: increased to 4 times per year (2X Jan-Jun, 2X Jul-Dec, one month minimum between sampling events)*

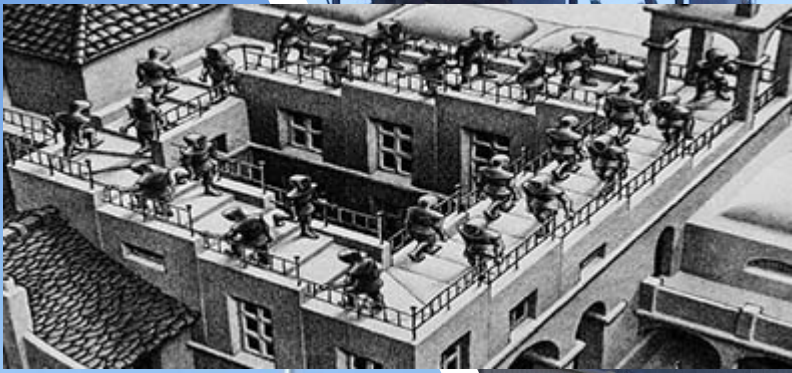
# 2019 MSGP BM Monitoring Waiver

- ▶ *Annual Average BM monitoring < BM, may discontinue sampling, per outfall, per parameter*
- ▶ *Annual Average BM monitoring > BM*
  - ▶ *If BM exceedance is attributable **solely** to natural background, may discontinue sampling for the parameter after notifying DEM*
  - ▶ *BM exceedance is not attributable solely to natural background, must implement corrective actions as a series of escalating responses*



# Natural Background

- ▶ Natural conditions are those that aren't caused by humans and can alter a waterway's physical, biological or chemical makeup (wildfires, floods, earthquakes, volcanic or geothermal activity, wind, insect infestation, and diseased vegetation).
- ▶ Natural background pollutants are substances that naturally occur in soils or groundwater, do not include pollutants from earlier activity on the site, or pollutants from neighboring sources that are not naturally occurring.
- ▶ If a permittee sampling exceedances are solely attributed to the presence of pollutants in natural background and not associated with industrial activities a natural background waiver report may be submitted.



Corrective Actions  
Framework

2017

2019

09/20/201

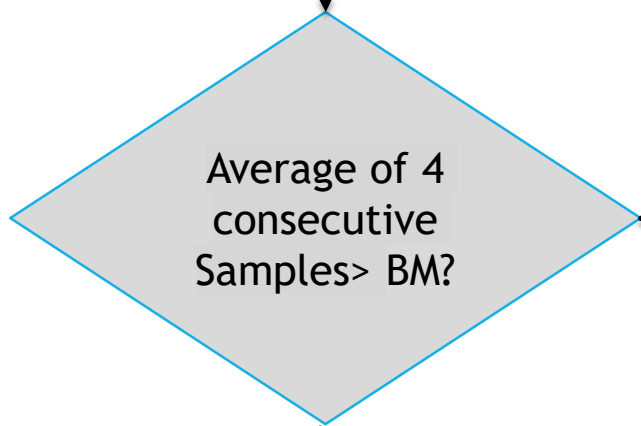


# CORRECTIVE ACTIONS

**REQUIREMENTS**  
Proposed: Benchmarks Monitoring for TSS and Oil and Grease Applicable to all Sectors.  
Benchmarks Monitoring 4X per year - 2X January-June + 2X July-December

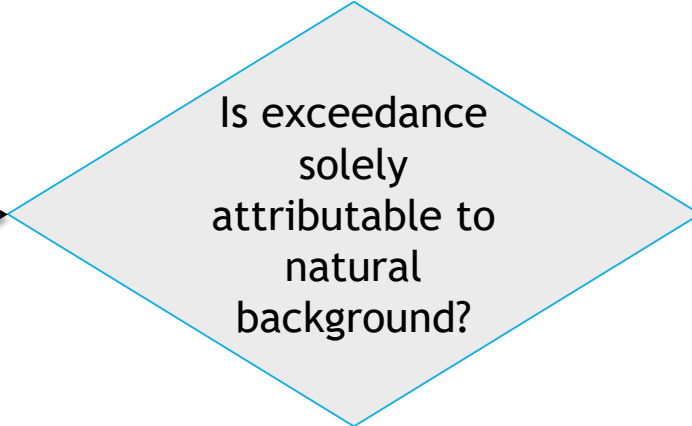
- Y1 and Y2 exceedances require submission of summary of CA for each BM exceedance with AR.
- Y3 Exceedances require submission of CA Report (within 90 days following monitoring year), includes: non-industrial pollutant source demonstration or engineering report for treatment BMPs for DEMs approval.
- With AR - Summarize level 3 CA. Continue Benchmarks Monitoring 4X per year.

- CORRECTIVE ACTIONS**
- **YEAR 1 Exceedances:** Operational source controls BMPs. Continue Benchmarks Monitoring 4X per year
  - **YEAR 2 Exceedances:** Structural source control BMPs (6 months to implement). Continue Benchmarks Monitoring 4X per year.
  - **YEAR 3 Exceedances** (following installation of structural source controls Y2.5-Y3.5): Install Treatment BMPs **unless** Non-Industrial Pollutant Source or run-on Demonstration; or pollutant reductions are not technologically available and economically practicable and achievable.



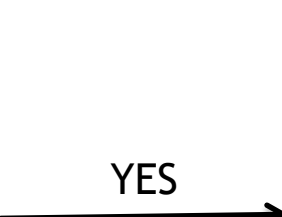
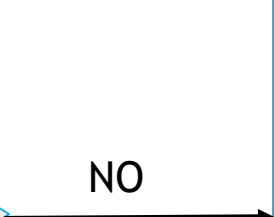
NO

- May discontinue BM Monitoring for the parameter and no corrective actions necessary







YES

- Notify DEM that exceedances are attributable solely to natural background, provide rationale
- Document supporting rationale in SWMP
- Corrective Action (CA) not required





# CORRECTIVE ACTIONS DUE TO BENCHMARK(S) EXCEEDANCES

|                             | 1/2020-12/2020  | 1/2021-12/2021  | 1/2022-12/2022  | 1/2023-12/2023  | 1/2023-5/2023   |
|-----------------------------|-----------------|---|---|---|---|
|                             | Year 1 Sampling | Year 2 Sampling   |   | Year 3 Sampling   |   |
| Operational Source Controls |                 |  |   |   |   |
| Structural Source Controls  |                 |   |  |  |   |
| Treatment Controls          |                 |   |   |   |  |

## OPERATIONAL SOURCE CONTROLS

- Increase Sweeping
- Employee Training
- Store residues away from drainage pathways
- Limit storage times of residues to prevent degradation and leachate
- Increase frequency of Inspections

## STRUCTURAL SOURCE CONTROLS

- Modify processes for storage or handling
- Use recirculating wash systems
- Use roofs, canopies, sheds to cover piles
- Pave spill prone areas to facilitate cleaning
- Elevate storage areas and divert runoff
- Build secondary containment

## TREATMENT SOURCE CONTROLS

- Vegetative buffer strips
- Wet Vegetated Treatment Systems – Bioretention with Underdrain
- Installation of filtering media
- Oil Water Separators

# 2019 Multi-Sector General Permit

## Impaired Waters Water Quality Based Effluent Limits

- ▶ *Facilities with discharges to non-bacteria/pathogens impaired waters:*
  - ▶ *Include enhanced BMPs (e.g., quarterly sweeping, implementation of floatable controls, other good housekeeping as needed)*
- ▶ *Discharges to waters with bacteria impairments:*
  - ▶ *Additional enhanced controls, including: Use known, methods to prevent rodents, birds, and other animals from feeding/nesting/roosting at the facility; annual dry weather inspection of the stormwater system; install structural source control BMPs (e.g., dumpsters, compost piles, food waste, and animal products).*

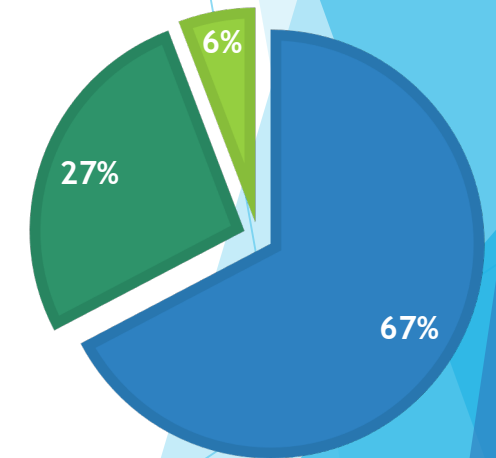
# 2019 MSGP Electronic Applications

## ▶ FORMS

- ▶ *NOIs and Stormwater Management Plans = SWPPPs*  
*Upload a copy or provide URL where a copy can be found*
- ▶ *No Exposure Certifications*
- ▶ **NEW:** *No Discharge Certifications - facilities with industrial activities, equipment, and materials exposed to stormwater that do not discharge that stormwater from the facility or discharge to Combined Sewers*
- ▶ *OTHER REPORTS: Annual Reports, DMRs*
- ▶ *E-mail Reminders*
- ▶ *Transparency e-enterprise.gov*

## SUBMISSIONS

■ NOIs ■ No Exposure ■ No Discharge ■



# SEARCHING PUBLIC DOCUMENTS AT E-ENTERPRISE.GOV

## General Permit Lookup Results

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Showing 6-10 of 256 Results

Rows

characters...

ility name, operator name, NPDES ID

| NPDES ID | Coverage Type  | Submitted Date | Submission Type | Submission Status | Facility Name             | Facility Operator         | Facility State | Facility City | Coverage Status | Effective Date | Expiration Date | Corresponding Documents |
|----------|----------------|----------------|-----------------|-------------------|---------------------------|---------------------------|----------------|---------------|-----------------|----------------|-----------------|-------------------------|
| 150C007  | General Permit | 2019-09-30     | Change          | Approved          | UNIVAR SOLUTIONS USA INC. | UNIVAR SOLUTIONS USA INC. | RI             | PROVIDENCE    | Active          | 2019-07-23     | 2024-05-02      | COR<br>ZIP<br>AR        |
| 150C010  | General Permit | 2019-08-01     | Renewal         | Approved          | MORTON SALT               | MORTON SALT, INC.         | RI             | PROVIDENCE    | Active          | 2019-08-01     | 2024-05-02      | COR<br>ZIP<br>AR        |
| 150C011  | General Permit | 2019-07-16     | Renewal         | Approved          | CHAMPION SALT, LLC        | CHAMPION SALT, LLC        | RI             | PROVIDENCE    | Active          | 2019-07-16     | 2024-05-02      | COR<br>ZIP              |
| 150D001  | General Permit | 2019-07-11     | Renewal         | -                 | CARDI CORP                | CARDI MATERIALS,          | RI             | WARWICK       | Active          | 2019-07-11     | 2024-05-02      | COR<br>ZIP              |

Annual Report

# Questions?

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